

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FILED _____ ENTERED _____
LODGED _____ RECEIVED _____
APR 21 2011
AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
NIGHT DROP BOX
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TYE EDWARD EVANS

*

Plaintiff

*

v.

*

Case No.:

GAUDENZIA, INC.

*

JKR11CV1042

Defendant

*

NOTICE OF REMOVAL

Gaudenzia, Inc., Defendant, by its attorney, James S. Aist, respectfully present the following Notice of Removal from the Circuit Court of Maryland for Baltimore City, pursuant to 28 U.S.C. §1441, *et seq*, and states as grounds for removal:

1. Plaintiff, Tye Edward Evans, has filed an action against Gaudenzia, Inc. (hereinafter "Gaudenzia") Defendant, in the Circuit Court of Maryland for Baltimore City, Case No. 24-C-11-001397, alleging that on September 30, 2009 Tye Edward Evans was injured due to the negligence and other wrongs of Defendant as a result of Defendant's alleged failure to properly administer Plaintiff's medication, failure to take Plaintiff's blood pressure, and failure to administer proper medical care while in the care and custody of Defendant. Plaintiff seeks damages for physical injuries and mental anguish sustained as a result of Defendant's alleged negligence. A copy of the Summons, Complaint and all pleadings filed in the Circuit Court of Maryland for Baltimore City are attached hereto as Exhibit 1.

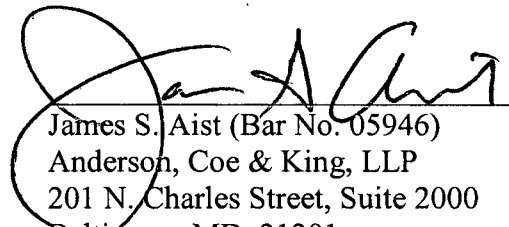
2. This action is removable to the United States District Court on the grounds of diversity of citizenship as the Plaintiff, Tye Edward Evans, is alleged to be a resident of

Baltimore, Maryland. Defendant, Gaudenzia, is a Pennsylvania corporation with its principle offices in Norristown, Pennsylvania. The amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), as the damages claimed by Plaintiff are in the amount of Two Million Dollars (\$2,000,000.00).

3. Gaudenzia was served with the Summons and Complaint on March 24, 2011.

WHEREFORE, Gaudenzia hereby prays the action now pending against it in the Circuit Court of Maryland for Baltimore City be removed to this Court.

Respectfully submitted



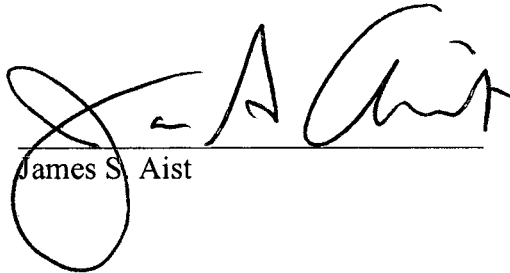
James S. Aist (Bar No. 05946)
Anderson, Coe & King, LLP
201 N. Charles Street, Suite 2000
Baltimore, MD 21201
410-752-1630
Attorney for Defendant Gaudenzia, Inc.

Certificate of Service

I HEREBY CERTIFY that on 21st day of April, 2011 a copy of Defendant's Notice of

Removal was mailed to:

Jessie Lyons Crawford, Esquire
Law Office of Jessie Lyons Crawford, LLC
2601 Maryland Avenue
Baltimore, MD 21218
Attorney for Plaintiff



James S. Aist